

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ADAM HELFAND, CARON HELFAND,)	
AND MITCHELL HELFAND,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 04-11800-DPW
)	
THE JOHN DEWEY ACADEMY, INC.,)	
THOMAS BRATTER, CAROLE)	
BRATTER, KEN STEINER, AND)	
GWENDOLYN HAMPTON,)	
)	
Defendants.)	
)	

AFFIDAVIT OF JOSEPH D. STEINFELD

I, Joseph D. Steinfield, hereby depose and state as follows.

1. I am counsel for defendants The John Dewey Academy, Inc., Thomas Bratter, Carole Bratter and Ken Steiner, (collectively, the “JDA Defendants”), in the above-captioned matter.

2. I submit this affidavit in order to identify certain documents and excerpts of deposition testimony on which the JDA Defendants rely in support of their Motion for Summary Judgment. True and accurate copies of the following documents and deposition excerpts are attached hereto:

Exhibit	Document/Testimony
1	Deposition of Gwendolyn Hampton
2	Deposition of Adam Helfand
3	Deposition of Caron Helfand

4	“Pre-Enrollment/Enrollment and Financial Agreement,” dated June 10, 1999
5	Release dated June 10, 1999
6	Deposition of Holly Anderson
7	Deposition of Mitchell Helfand
8	E-mail from Adam Helfand to Gwendolyn Hampton dated March 17, 2003
9	Caron Helfand’s Answers to Interrogatories
10	Mitchell Helfand’s Answers to Interrogatories
11	List of School Infractions by Adam Helfand at Glenbrook High Schools
12	Deposition of Thomas Bratter

Signed under the pains and penalties of perjury this 31st day of July, 2006,

/s/ Joseph D. Steinfield
Joseph D. Steinfield

I, Joseph D. Steinfield, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants on July 31, 2006.

/s/ Joseph D. Steinfield